

# Memorandum



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DATE : December 19, 1978  
TO : Walt Sickler  
FROM : Pete Henault (Sgd.) Pete Henault  
SUBJECT : PCB Identification, Cleanup and Disposal

As requested in a memo from Mr. Vickery to all directors, I am writing to convey OEA's position with regard to City Light's PCB disposal program. First of all, I would like to commend the Operations Division for its quick and positive response in implementing the pertinent EPA regulations, as burdensome as they may be. I am confident that few utilities have moved as rapidly as we have.

OEA's activities in this effort have included:

- o Inspection of the temporary storage shed at SSC recommending alterations that would bring it into compliance with EPA's temporary storage regulations.
- o Preparation of a draft report on regulations and departmental requirements regarding PCB's, with an environmental analysis of proposed PCB substitute fluids. This report is being revised and should be available for departmental review in the near future.
- o Efforts to determine the best procedures to follow in the event of a major PCB spill into a body of water, similar to the September, 1974 incident involving a spill of 265 gallons of PCB into the Duwamish River. A report summarizing the state-of-the art should be available early next year.
- o Extensive consultation with the EPA, to clarify certain aspects of their regulations, as well as with other utilities, individuals, organizations and agencies involved with PCB disposal.

One of the major problems identified so far involves obtaining sufficient insurance coverage to protect City Light in the event of an accident en route to the PCB disposal site at Wescon, Idaho. Our drivers are currently making about four trips yearly without additional insurance coverage. A major spill of PCB into the Columbia River could involve cleanup and damage costs running into millions of dollars. Even if City Light contracts with an insured commercial carrier to transport our PCB materials to Idaho, who would pay such extensive cleanup costs in the event of a major spill? The EPA is aware of this liability question and will probably issue regulations to license private and commercial carriers of PCB within a year or two. These

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licensed carriers would then assume full responsibility for the fate of the PCB material. Until such regulations are issued, however, City Light must be prepared to cope with the problems presented by a major spill of PCB. Our investigation into the state-of-the-art in major PCB spill cleanup procedures should provide a better basis upon which to act. Preliminary findings show that:

- o Since PCB is heavier than water the material would have to be dredged from the river or lake bottom, including all highly contaminated sediments.
- o Cleanup costs based on the Duwamish spill and the efforts to clean up the PCB contaminated upper Hudson River range from \$50-200 per pound of PCB recovered. However, damage to any commercial fishing or shellfish harvesting areas could result in much higher costs.

In the event of a major spill, OEA will contact EPA's Emergency Response Team and other agencies, including the Departments of Ecology and Fisheries, as necessary, to deal with the situation.

If you have any questions, please contact Bill Riley at x3568.

WR:ag

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